

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

CommScope, Inc., CommScope Inc. of North Carolina, and CommScope Technologies, LLC,	)	Civil Action No. 19-cv-15962-JXN-LDW
	)	
Plaintiffs,	)	
	)	
v.	)	<b>DECLARATION OF FARID FIROUZBAKHT IN SUPPORT OF JOINT MOTION TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH COMMSCOPE'S MOTION TO COMPEL</b>
	)	
Rosenberger Technology (Kunshan) Co. Ltd., Rosenberger Asia Pacific Electronic Co., Ltd., Rosenberger Technology LLC, Rosenberger USA Corp., Rosenberger North America Pennsauken, Inc., Rosenberger Site Solutions, LLC, Rosenberger Hochfrequenztechnik GmbH & Co. KG, Northwest Instrument, Inc., and CellMax Technologies AB,	)	
	)	
Defendants.	)	
	)	

I, Farid Firouzbakht, declare as follows:

1. I am the Senior Vice President for Outdoor Wireless Networks at CommScope, Inc. (“CommScope”). CommScope’s base station antenna (“BSA”) products are part of its Outdoor Wireless Networks business. I make this Declaration in support of the Joint Motion to Seal (the “Motion”) in accordance with Local Civil Rules 5.3(c)(3) and 7.2 in connection with sealing portions of the sealing portions of the materials submitted with CommScope’s Letter Request to

Compel Rosenberger to Produce Specific Hardware Discovery (ECF No. 490); Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants ( ECF No. 490-1) and Exhibits thereto (ECF Nos. 490-2, 490-5 to 490-18, 490-20 to 490-22, and 490-24 to 420-25); Expert Declaration of Dr. Daniel van der Weide with Respect to Issues Raised in CommScope's Letter Motion to Compel Specific Hardware Discovery (ECF No. 490-26); Declaration of Martin Zimmerman, Ph.D. in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-30) and Exhibits thereto (ECF Nos. 490-31 to 490-32); Rosenberger's Letter Opposition to CommScope Letter Motion to Compel (ECF No. 495); and Exhibits to the Declaration of John Lu in Support of Rosenberger's Opposition to CommScope's Motion to Compel (ECF Nos. 495-2, and 494-5 to 495-12) (collectively, the "Identified Materials").

2. The documents identified in the Consolidated Index submitted herewith should be maintained under seal on the Court's docket because each contains confidential, proprietary, and non-public information regarding, for example: (1) CommScope's trade secrets; (2) confidential and nonpublic information about CommScope's products, business practices, and strategies; and (3) discovery documents that the parties have deemed Confidential or Attorneys'

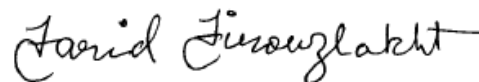
Eyes Only under the Discovery Confidentiality Order entered by the Court on September 24, 2019.

3. Based upon my own knowledge, public disclosure of this information would cause clearly defined and serious injury to CommScope. The redacted portions of the material that CommScope seeks to seal and/or the materials that CommScope seeks to seal in their entirety are now narrowly tailored to material that discloses confidential, proprietary, and non-public information and/or information contained in discovery materials that have been designated Confidential or Attorneys' Eyes Only by the propounding party.

4. There are no objections to the Motion by either party.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 6, 2022



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**Farid Firouzbakht**